

REMARKS

In response to Examiner's rejection of pending claims 1-20, Applicant respectfully asks Examiner for reconsideration of the application and pending claims 1-20 based on the following remarks.

Claim Rejections – 35 U.S.C. § 102

The Examiner has rejected claims 1-5, 7-11, 13-18, and 20 under 35 U.S.C §102, as being anticipated by U.S. Patent No. 6,243,774 B1 to Eide et al. ("Eide"). Applicant has cancelled claims 4, 10, and 17. Additionally, for the reasons set forth below, Applicant asserts that the cited reference fails to teach or render obvious Applicant's invention as claimed in claims 1-3, 5, 7-9, 11, 13-16, 18, and 20.

Eide discloses a method "of managing computer resources [to]... facilitate concurrent maintenance operations by automatically re-associating existing resources in a computer... with appropriate hardware devices installed into the computer after a concurrent maintenance operation has been performed." (Eide abstract lines 1-6) "To map the resource to a hardware device, a location identifier, a device type identifier and a device identifier are provided. The location identifier provides an indication of where the associated hardware device is located in the computer..." (Eide column 9, lines 7-11) Eide also discloses a HRI (hardware resource information) object and a HRI manager. "The HRI manager typically relies on a UID map or table that includes a plurality of entries, with each entry mapping a UID to a particular hardware driver pointer." (Eide column 13, line 65 to column 14, line 1).

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims:

“A method comprising identifying a device by a unique identifier, obtaining the unique identifier, and using the unique identifier in conjunction with a mapping table, wherein the mapping table contains at least a column containing a plurality of unique identifiers of devices coupled to a column containing a plurality of updateable addresses of drivers specific to each device, to obtain an address of a driver for the device, and one or more columns that include additional information about one or more of the device and the device driver.”

The mapping table associates unique device identifiers with corresponding addresses pointing to device drivers specific to each device. The mapping table efficiently associates every individual device identifier present in the system to the every corresponding driver address per device and it also includes additional information relating to the device, the device driver, or the device and the device driver.

Examiner states in the latest office communication mailed on February 13, 2004 that:

“Figure 5 of Eide and the related discussion in the specification and section 13:65 – 14:5 [] shows that the information contained in the data structure of HRI (hardware resource information) object 114 is managed by HRI Manager 120 which uses a UID (Unique Identifier) map or table that includes

pluralities of entries, with each entry mapping a UID to particular hardware driver pointer. Eide, does therefore teach Applicant's centralized mapping table index of a plurality of devices and their respective driver address locations." (Examiner's Detailed Action, Page 3)

Eide's HRI object is a detailed version of Eide's resource data structure. The HRI object only has information relating to one resource, just like the resource data structure (Eide's Figure 2, Item 40). The UID table, which the Examiner compares to Applicant's mapping table, is composed solely of entries consisting of a unique identifier and a hardware driver pointer. Furthermore, Examiner states that "Eide further discloses wherein the mapping table also contains one or more columns that include additional information about the device, the device driver, or the device and the device driver." (Examiner's Detailed Action, Page 6) On the contrary, Eide's structure that the Examiner compares to Applicant's mapping table is the UID table, which does not include additional information about the device, the device driver, or the device and the device driver.

Applicant's mapping table is one data structure meant to act as a centralized index lookup table and information storage area for multiple devices, their associated device drivers, and additional information about the device, the device driver, or the device and the device driver. This centralized information storage area and index lookup table is superior in functionality to Eide's UID table, which has entries consisting only of a unique identifier and a hardware driver pointer. Applicant's mapping table is also not limited to a single device as Eide's HRI object is. Furthermore, Applicant's mapping

table is more efficient as a single, centralized data structure that integrates additional information about the device, the device driver, or the device and the device driver than Eide's multiple, independent HRI objects. Therefore, because no structure in Eide accomplishes the same functionality as Applicant's efficient and centralized mapping table, Eide does not teach the presently claimed invention. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claim 1.

Claims 2, 3, and 5 are dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Eide does not anticipate claims 2, 3, and 5.

In regard to independent claims 7 and 14, Eide does not anticipate Applicant's invention for the same reason as independent claim 1. Again, Applicant's mapping table acts as a centralized information storage area and index lookup table for multiple devices, their associated device drivers, and additional information about the device, the device driver, or the device and the device driver. Applicant's mapping table is superior in functionality to Eide's UID table, which has entries consisting only of a unique identifier and a hardware driver pointer. Applicant's mapping table is also not limited to a single device as Eide's HRI object is. Furthermore, Applicant's mapping table is more efficient as a single, centralized data structure that integrates additional information about the device, the device driver, or the device and the device driver than Eide's multiple, independent HRI objects. Therefore, because no structure in Eide accomplishes the same functionality as Applicant's efficient and centralized mapping table, Eide does not teach

the presently claimed invention. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claims 7 and 14.

Furthermore, claims 8, 9, 11, and 13 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide does not anticipate claims 8, 9, 11, and 13.

Additionally, claims 15, 16, 18, and 20 are dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide does not anticipate claims 15, 16, 18, and 20.

As such, Eide does not teach or anticipate Applicant's invention as claimed in pending claims 1-3, 5, 7-9, 11, 13-16, 18, and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 102 rejection of claims 1-3, 5, 7-9, 11, 13-16, 18, and 20.

Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 6,243,774 B1 to Eide et al. ("Eide") in view of Internet Engineering Task Force ("Task Force"), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. For the same reasons set forth above in regard to Eide in view of the response to the 35 U.S.C §102 rejection, Applicant asserts that the cited references fail to teach, suggest, or render obvious Applicant's invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully

submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Thus, Eide and Task Force do not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.

If there are any additional charges, please charge Deposit Account No 02-2666.


If a telephone conference would facilitate the prosecution of this application, the

Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully submitted,

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